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Attorneys for Attorneys for Federal Defendants
and Defendant United States of America.

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION**

CALIFORNIA COALITION FOR WOMEN
PRISONERS; R.B.; A.H.R.; S.L.; J.L.; J.M.;
G.M.; A.S.; and L.T., individuals on behalf of
themselves and all others similarly situated,

CASE NO. 4:23-CV-04155-YGR

Plaintiffs

v.

UNITED STATES OF AMERICA FEDERAL
BUREAU OF PRISONS, a governmental entity;
BUREAU OF PRISONS DIRECTOR
COLETTE PETERS, in her official capacity;
FCI DUBLIN WARDEN THAHESHA JUSINO,
in her official capacity; OFFICER
BELLHOUSE, in his individual capacity;
OFFICER GACAD, in his individual capacity;
OFFICER JONES, in his individual capacity;
LIEUTENANT JONES, in her individual
capacity; OFFICER LEWIS, in his individual
capacity; OFFICER NUNLEY, in his individual
capacity; OFFICER POOL, in his individual
capacity; LIEUTENANT PUTNAM, in his
individual capacity; OFFICER SERRANO, in
his individual capacity; OFFICER SHIRLEY, in
his individual capacity; OFFICER SMITH, in his
individual capacity; and OFFICER VASQUEZ,
in her individual capacity,

DECLARATION OF MADISON MATTIOLI

Defendants.

I, Madison Mattioli, declare as follows:

- 1 1. My name is Madison Mattioli, and I am an attorney of record in the above captioned case
- 2 representing Federal Defendants and Defendant United States of America.
- 3 2. Opposing counsel was not contacted prior to filing this motion, as we are requesting that the
- 4 documents to be filed under seal be reviewed *in camera*.
- 5 3. Federal Defendants and Defendant United States of America cannot disclose to Plaintiffs the
- 6 contents of the document filed under seal to seek their permission on it, as the documents contain
- 7 sensitive information the disclosure of which would be detrimental to operations and security.
- 8 4. I declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the foregoing is true and correct.
- 9 Executed this 1st day of April, 2024, at Helena, MT.

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11 /s/ Madison L. Mattioli
12 MADISON L. MATTIOLI
13 Assistant United States Attorney
14 District of Montana
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